REMARKS

Applicant respectfully requests reconsideration of this application in view of the

following remarks. Claims 11, 23 and 35 have been amended. Claims 8-12, 20-24 and 32-

48 are pending. No new matter has been entered.

As amended, claim 11 recites:

11.   A method performed by a computer system, comprising:
storing a first version of a paper, the first version including first content at a
first location within the paper;
translating the first version into a second version of the paper, the second
version being displayable on a display device as a likeness of the paper, the second
version including the first content at the first location within the paper;
in response to the first content at the first location within the paper, detecting a
reference within the first content at the first location within the paper, the detected
reference being associated with a second location; and
in response to the detected reference, forming a link within the second version
between the first location and the second location, the link being embedded within at
least a portion of the first content at the first location within the paper, and the portion
of the first content at the first location within the paper being: displayable on the
display device as part of at least the second version, which is displayable on the
display device as the likeness of the paper; and user-selectable through the link to
cause an operation associated with the second location.

As amended, claim 23 recites:

23.   A system, comprising:
a computing device for:
> storing a first version of a paper, the first version including first
> content at a first location within the paper;
> translating the first version into a second version of the paper, the
> second version being displayable on a display device as a
> likeness of the paper, the second version including the first
> content at the first location within the paper;
> in response to the first content at the first location within the paper,
> detecting a reference within the first content at the first location
> within the paper, the detected reference being associated with a
> second location; and
> in response to the detected reference, forming a link within the second
> version between the first location and the second location, the
> link being embedded within at least a portion of the first
> content at the first location within the paper, and the portion of
> the first content at the first location within the paper being:
> displayable on the display device as part of at least the second
> version, which is displayable on the display device as the
> likeness of the paper; and user-selectable through the link to
> cause an operation associated with the second location.

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As amended, claim 35 recites:

35.   A computer program product, comprising:
a computer program processable by a computer system for causing the
computer system to:

> store a first version of a paper, the first version including first content
> > at a first location within the paper;
> translate the first version into a second version of the paper, the second
> > version being displayable on a display device as a likeness of
> > the paper, the second version including the first content at the
> > first location within the paper;
> in response to the first content at the first location within the paper,
> > detect a reference within the first content at the first location
> > within the paper, the detected reference being associated with a
> > second location; and
> in response to the detected reference, form a link within the second
> > version between the first location and the second location, the
> > link being embedded within at least a portion of the first
> > content at the first location within the paper, and the portion of
> > the first content at the first location within the paper being:
> > displayable on the display device as part of at least the second
> > version, which is displayable on the display device as the
> > likeness of the paper; and user-selectable through the link to
> > cause an operation associated with the second location; and
> an apparatus from which the computer program is accessible by the computer
system.

In Applicant's September 14, 2005 Response to Office Action, claim 11 was
distinguished from U.S. Patent No. 6,763,496 ("Hennings"). In view of this Supplemental
Amendment, claim 11 remains distinguished from Hennings. For example, in claim 11, the
first version of the paper includes "*the first content at the first location within the paper.*"
Also, the second version of the paper includes "*the first content at the first location within
the paper.*" Further, a reference is detected within "*the first content at the first location
within the paper.*" Moreover, in response to the detected reference, a link is formed within
the second version between the first location and a second location, the link being embedded
within at least a portion of "*the first content at the first location within the paper.*" Such
portion of "*the first content at the first location within the paper*" is displayable on the
display device as part of at least the second version, which is displayable on the display
device as the likeness of the paper.

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Unlike claim 11, Hennings teach away from such a combination. In Hennings, a first version of a page (i.e., design page 550 of Fig. 9A) is translated into a second version of a page (i.e., display page 584 of Fig. 9B). As shown in Fig. 9B, the created hyperlinks 588 are embedded within respective "Elephant," "Rhino" and "Hippo" content of the display page 584, which are different from one another, and likewise are different from the "Large Animals" content of the display page 584. Likewise, the created hyperlinks 590 are embedded within respective "Lion," "Tiger" and "Leopard" content of the display page 584, which are different from one another, and likewise are different from the "Big Cats" content of the display page 584.

Although the created hyperlinks 588 are embedded within respective "Elephant," "Rhino" and "Hippo" content of the display page 584, the first version of the page (i.e., design page 550 of Fig. 9A) fails to include such content. Likewise, although the created hyperlinks 590 are embedded within respective "Lion," "Tiger" and "Leopard" content of the display page 584, the first version of the page (i.e., design page 550 of Fig. 9A) fails to include such content. Thus, such content fails to satisfy *"the first content at the first location within the paper"* limitation in claim 11, because claim 11 recites that the <u>first</u> version of the paper includes *"the first content at the first location within the paper."*

Moreover, although the first version of the page (i.e., design page 550 of Fig. 9A) includes "category_bot= large" and "category_bot= cats" content, the second version of the page (i.e., display page 584 of Fig. 9B) fails to include such content. Instead, the second version of the page (i.e., display page 584 of Fig. 9B): (a) replaces the "category_bot= large" content with the "Elephant," "Rhino" and "Hippo" content; and (b) likewise, replaces the "category_bot= cats" content with the "Lion," "Tiger" and "Leopard" content. Thus, the "category_bot= large" and "category_bot= cats" content fail to satisfy *"the first content at the first location within the paper"* limitation in claim 11, because claim 11 recites that the <u>second</u> version of the paper includes *"the first content at the first location within the paper."*

Likewise, the "category_bot= large" and "category_bot= cats" content are not displayable on the display device as part of the second version of the page (i.e., display page 584 of Fig. 9B). Thus, the "category_bot= large" and "category_bot= cats" content fail to satisfy *"the first content at the first location within the paper"* limitation in claim 11, because

claim 11 recites that the portion (in which the link is embedded) of *"the first content at the first location within the paper"* is displayable on the display device as part of at least the second version, which is displayable on the display device as the likeness of the paper.

Further, although both the first version of the page (i.e., design page 550 of Fig. 9A) and the second version of the page (i.e., display page 584 of Fig. 9B) include the "Large Animals" and "Big Cats" content, Hennings teaches away from embedding the created hyperlinks 588 and 590 within such content. Instead, the created hyperlinks 588 are embedded within respective "Elephant," "Rhino" and "Hippo" content, and the created hyperlinks 590 are embedded within respective "Lion," "Tiger" and "Leopard" content. Thus, the "Large Animals" and "Big Cats" content fail to satisfy *"the first content at the first location within the paper"* limitation in claim 11, because claim 11 recites that a link is embedded within at least a portion of *"the first content at the first location within the paper."*

Clearly, therefore, Hennings fails to teach claim 11, and in fact teaches away from it. Thus, the motivation for advantageously combining the claimed elements would arise solely from hindsight based on Applicant's teachings in its own specification. Accordingly, the PTO's burden of factually supporting a prima facie case of obviousness has not been met.

In relation to claims 23 and 35, Hennings is likewise defective in supporting a prima facie conclusion of obviousness.

Thus, a rejection of claims 11, 23 and 35 is not supported.

Conclusion

For these reasons, and for other reasons clearly apparent, Applicant respectfully requests allowance of claims 11, 23 and 35.

Dependent claims 8-10, 12 and 37-40 depend from and further limit claim 11 and therefore are allowable.

Dependent claims 20-22, 24 and 41-44 depend from and further limit claim 23 and therefore are allowable.

Dependent claims 32-34, 36 and 45-48 depend from and further limit claim 35 and therefore are allowable.

An early formal notice of allowance of claims 8-12, 20-24 and 32-48 is requested.

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To the extent that this Supplemental Amendment results in additional fees, the
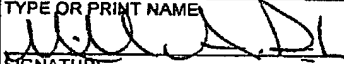Commissioner is authorized to charge deposit account no. 50-3524.

Applicant has made an earnest attempt to place this case in condition for allowance.
If any unresolved aspect remains, the Examiner is invited to call Applicant's attorney at the
telephone number listed below.

Respectfully submitted,

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